

EXHIBIT 10

Rendon, Carole S.

From: Rendon, Carole S.
Sent: Saturday, December 29, 2018 10:01 AM
To: David@SpecialMaster.Law
Cc: xALLDEFENDANTS-MDL2804-Service@arnoldporter.com;
MDL2804discovery@motleyrice.com; Mark Pifko
Subject: RE: Response to Mr. Pifko's December 14, 2018 Correspondence

Special Master Cohen:

If it was not already crystal clear, Mr. Pifko's response confirms plaintiffs' true motive in seeking my deposition. Plaintiffs have no interest in, or need for my testimony. They subpoenaed me for deposition to engage in a fishing expedition to see if they could find a basis to seek my disqualification. That is why Mr. Pifko so quickly offered to withdraw the subpoena seeking my testimony, if I would agree to withdraw from the case. I will not.

Plaintiffs' subpoena for my deposition is blatantly improper. The Court should order its immediate withdrawal.

If we are forced to continue to litigate this charade in the context of a motion to quash, we reserve our rights to seek sanctions for plaintiffs' clear abuse of legal process.

Thank you,

Carole Rendon

Carole S. Rendon
Partner

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From: Mark Pifko <MPifko@baronbudd.com>
Sent: Friday, December 28, 2018 5:03 PM
To: David@SpecialMaster.Law; Rendon, Carole S. <crendon@bakerlaw.com>
Cc: xALLDEFENDANTS-MDL2804-Service@arnoldporter.com; MDL2804discovery@motleyrice.com
Subject: Re: Response to Mr. Pifko's December 14, 2018 Correspondence

Ms. Rendon and Special Master Cohen:

We are in receipt of the email and attachment below. We disagree with the positions asserted in Ms. Rendon's letter. Nevertheless, in the spirit of compromise and good faith, I wanted to convey the following offer to Ms. Rendon: If you agree to withdraw from the case, we will agree to withdraw the subpoena seeking your testimony. Please let us know by early next week so we can plan accordingly.

Mark Pifko

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From: "Bertke, Melissa D." <mbertke@bakerlaw.com>

Date: Friday, December 28, 2018 at 11:43 AM

To: "David@SpecialMaster.Law" <David@SpecialMaster.Law>, Mark Pifko <MPifko@baronbudd.com>

Cc: "crendon@bakerlaw.com" <crendon@bakerlaw.com>, "xALLDEFENDANTS-MDL2804-Service@arnoldporter.com" <xALLDEFENDANTS-MDL2804-Service@arnoldporter.com>, "MDL2804discovery@motleyrice.com" <MDL2804discovery@motleyrice.com>

Subject: Response to Mr. Pifko's December 14, 2018 Correspondence

Special Master Cohen and Mr. Pifko:

Please see the attached letter from Carole Rendon in response to Mr. Pifko's correspondence of December 14.

Melissa Bertke

Partner

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